

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

AAshahla Al-Ali

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

v.

Ken Garff Automotive Group
Southfield Chrysler Dodge Jeep Ram

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case: 2:18-cv-12687
Judge: Borman, Paul D.
MJ: Majzoub, Mona K.
Filed: 08-28-2018 At 12:25 PM
CMP Al-Ali v. Ken Garff Automotive
Group et ano. (EK)

Jury Trial: ☒ Yes ☐ No
(check one)

Complaint for Employment Discrimination

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>AA'shahla Al-Ali</u>
Street Address	<u>21067 Beechwood Avenue</u>
City and County	<u>Eastpointe/Oakland</u>
State and Zip Code	<u>Michigan 48021</u>
Telephone Number	<u>586-588-2838</u>
E-mail Address	<u>aashahlaalali@yahoo.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Ken Garff Automotive Group</u>
Job or Title (if known)	<u></u>
Street Address	<u>21800 Telegraph Road</u>
City and County	<u>Southfield/Oakland</u>
State and Zip Code	<u>Michigan 48034</u>
Telephone Number	<u>248-354-2950</u>
E-mail Address (if known)	<u></u>

Defendant No. 2

Name	<u>Colleen Coleman</u>
Job or Title (if known)	<u>Finance Manager</u>
Street Address	<u>28100 Telegraph Road</u>
City and County	<u>Southfield/Oakland</u>
State and Zip Code	<u>Michigan 48034</u>
Telephone Number	<u>248-354-2950</u>
E-mail Address (if known)	<u></u>

Defendant No. 3

Name _____

Job or Title _____

(if known) _____

Street Address _____

City and County _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

(if known) _____

Defendant No. 4

Name _____

Job or Title _____

(if known) _____

Street Address _____

City and County _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

(if known) _____

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is:

Name Southfield Chrysler Dodge Jeep Ram

Street Address 28100 Telegraph Road

City and County Southfield Oakland County

State and Zip Code Michigan 48034

Telephone Number 248-354-2950

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to *(check all that apply)*:

- ☒ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).
- (Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*
- ☐ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.
- (Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)*
- ☐ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.
- (Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*
- ☐ Other federal law *(specify the federal law)*:
- ☒ Relevant state law *(specify, if known)*:
THE WHISTLEBLOWERS' PROTECTION ACT
Act 469 of 1980
15.362 Section 2
- ☐ Relevant city or county law *(specify, if known)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes (*check all that apply*):

- ☐ Failure to hire me.
- ☐ Termination of my employment.
- ☒ Failure to promote me.
- ☐ Failure to accommodate my disability.
- ☒ Unequal terms and conditions of my employment.
- ☒ Retaliation.
- ☒ Other acts (*specify*):
 Drug use at the dealership
 Identity Theft
 Sex on company property
 Misuse of company property

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)
07/01/2017-09/08/2017

C. I believe that defendant(s) (*check one*):

- ☐ is/are still committing these acts against me.
- ☒ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (*check all that apply and explain*):

- ☒ race _____
- ☒ color _____
- ☐ gender/sex _____
- ☐ religion _____
- ☐ national origin _____
- ☐ age. My year of birth is _____. (*Give your year of birth only if you are asserting a claim of age discrimination.*)
- ☐ disability or perceived disability (*specify disability*)

- E. The facts of my case are as follows. Attach additional pages if needed.
- *Company demo reduced and changed after I reported wrong doing.
 - *Not allowed to apply for open finance manager position
 - *Internet leads reduced (see attached)
 - *Hostile work environment included verbal harassment
 - *Complaint of sexual harassment ignored.
 - *GSM Chris Dillaway grabbed me by neck and tried to force me down stairs.
 - *GSM Chris Dillaway made sexual comments to me in front of other managers
 - *GSM placed penis on my buttocks and said he has a "Beer can Penis" instead of a long one.
 - *Offered a \$1000 to keep quiet. See attached
 - *Subjected to verbal abuse by Colleen Coleman on the showroom floor; in the form of yelling at me.

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

10/24/2017

- B. The Equal Employment Opportunity Commission *(check one)*:

- ☐ has not issued a Notice of Right to Sue letter.
☒ issued a Notice of Right to Sue letter, which I received on *(date)*

Recieved 06/08/2018 - Mailed 6/4/2018

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one)*:

- ☐ 60 days or more have elapsed.
☐ less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. Attach additional pages if needed.

Compensatory and Punitive Damages of \$500,000.00

Attorney Fees (TBD)

Filing and Court Fees (TBD)

Non disclosure Agreement

Loss of Education Expenses (Employer paid education) Est:\$50,000.00

Loss of Income as a Finance manager (Est: 120,000.00 Annual Income)

Federal and State income tax liability in the amount of \$300,000.00

Letter of apology

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: August 28th, 2018.

Signature of Plaintiff

Printed Name of Plaintiff AA'shahla Al-Ali

Additional Information:

See Attached

NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: **Aa'Shahla Al-Ali**
21067 Beechwood Avenue
Eastpointe, MI 48021

From: **Detroit Field Office**
477 Michigan Avenue
Room 865
Detroit, MI 48226



On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

471-2017-03526**Johnnie R. King,**
Investigator**(313) 226-6037**

(See also the additional information enclosed with this form.)

NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), or the Genetic Information Nondiscrimination Act (GINA): This is your Notice of Right to Sue, issued under Title VII, the ADA or GINA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII, the ADA or GINA **must be filed in a federal or state court WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)



More than 180 days have passed since the filing of this charge.



Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of this charge.



The EEOC is terminating its processing of this charge.



The EEOC will continue to process this charge.

Age Discrimination in Employment Act (ADEA): You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, the paragraph marked below applies to your case:



The EEOC is closing your case. Therefore, your lawsuit under the ADEA **must be filed in federal or state court WITHIN 90 DAYS of your receipt of this Notice**. Otherwise, your right to sue based on the above-numbered charge will be lost.

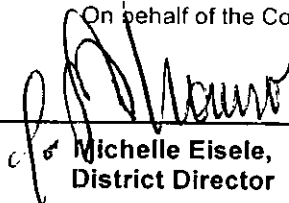


The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of the charge, you may file suit in federal or state court under the ADEA at this time.

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission

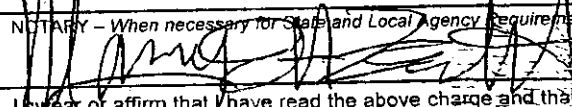
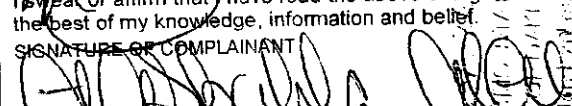
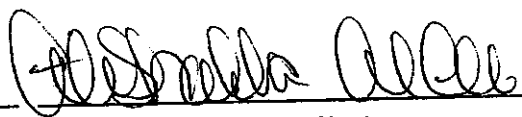

Michelle Eisele,
District Director

6/4/18
(Date Mailed)

Enclosures(s)

CC: **KEN GARFF/SOUTHFIELD CHRYSLER JEEP**
c/o Ryan J. Koss
STARR, BUTLER, ALEXOPOULOS & STONER, PLLC
Oakland Commons Building
20700 Civic Center Drive, Suite 200
Southfield, MI 48076

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: Agency(ies) Charge No(s): <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC </div> <div style="text-align: right;"> 471-2017-03526 </div> </div>	
Michigan Department Of Civil Rights and EEOC <small>State or local Agency, if any</small>			
Name (indicate Mr., Ms., Mrs.) Ms. AA'shahla Al-Ali		Home Phone (Incl. Area Code) (586) 588-2838	Date of Birth 1972
Street Address 21067 Beechwood Avenue, Eastpointe, MI 48021			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name KEN GRAFF/ SOUTHFIELD CHRYSLER JEEP		No. Employees, Members Unknown	Phone No. (Include Area Code) (248) 354-2950
Street Address 28100 Telegraph Road, Southfield, MI 48034			
Name		No. Employees, Members	Phone No. (Include Area Code)
Street Address			
DISCRIMINATION BASED ON (Check appropriate box(es).) <input checked="" type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest 08-09-2017 09-09-2017 <input type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): <p>On or about May 18, 2017, I began employment with the above-named employer; I was last employed as a New Car Sales.</p> <p>During my employment, I was consistently subjected to sexual harassment by the General Sales Manager, Caucasian. On August 9, 2017, I reported the sexual harassment via written and verbal communications to Human Resources, my direct Supervisor and a Caucasian female General Sales Manager. At the time of my reporting, the harasser had been discharged for another incident of sexual harassment. As a result of my reporting, I was retaliated against by the Caucasian female General Sales Manager's harassing/racially motivated behavior by her treating me differently than similarly-situated Caucasian co-workers by her behavior of standing in the middle of the floor and yelling at me, instead of talking to me in the manner she does my Caucasian co-workers, by reducing my leads to 19 per month from 40-50 per month while not reducing my Caucasian co-workers' leads, taking my demo and trading it down to a lessor model, while not touching anyone else's demos and giving me false information about an open Use Car Finance Manager's position I tried to apply for. On August 30, 2017, I was given permission by my Sales Manager to come in 2 hours late. In a meeting, she then expressed ill feelings about me to everyone. Therefore, on September 9, 2017, I terminated my employment (constructive discharge), due to my General Sales Manager's behavior.</p> <p>I believe that I was subjected to sexual harassment, and different terms and conditions of employment due to gender, female; race, Black, and retaliated against for reporting sexual harassment, which resulted in constructive discharge, in violation of Title VII of the Civil Rights Act of 1964, as amended.</p>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures. I declare under penalty of perjury that the above is true and correct.		NOTARY - When necessary for State and Local Agency Requirements  I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT  SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year) 10-21-17 MARY E. (A) ZAHRT NOTARY PUBLIC, STATE OF MI County of Oakland My Commission Expires 4/13/20	
Date 10-21-17		Charging Party Signature 	

NAME

NUMBER

DATE

AASHAHLA AL-ALI

149

08/10/17

TAKE HOME BONUS FOR JULY 2017

CREATED BY: 18DANIELLE

DW

08/10/17 308

1,000.00

149

REMITTANCE ADVICE
DETACH AND RETAIN**SOUTHFIELD CHRYSLER****DODGE JEEP RAM**28100 TELEGRAPH RD
SOUTHFIELD, MI 48034
PHONE 248-354-2950CHECK NO.
31794NET
AMOUNT**\$1,000.00**

Given to Day after I made Complaint.
~~Was~~ Not reported to income & not earned

KEN GARFF DOES OWN Southfield
Chrysler

Saved Vehicles

CONTACT US

Ken Garff Automotive Group

Our Locations

Cadillac of Novi

(<http://www.cadillacofnovi.com/>)

41350 Grand River Ave
Novi, MI 48375

Sales: (866) 613-0742

Service: (866) 613-0741

Parts: (866) 613-0740

Southfield Chrysler Dodge Jeep Ram

(<https://www.southfieldchryslerdodgejeep.com/>)

28100 Telegraph Road
Southfield, MI 48034

Sales: (888) 714-1015

Service: (888) 718-2163

Parts: (888) 711-9615

Telegraph Chrysler Dodge Jeep Ram

(<https://www.telegraphchryslerdodgejeep.com/>)

32000 Telegraph Road
Taylor, MI 48180

Sales: (888) 707-1066

Service: (888) 819-7507

Parts: (888) 709-4510

QUICK LINKS

INVENTORY

STAY IN TOUCH

G

(<https://www.google.com/maps/place/Ken+Garff+Automotive+Group,+111+East+Broadway,+Salt+Lake+City,+UT+84111/@40.758333,-111.888889,15z>)

4m2!


3m1!


150x0:0xcdc7613a0daa493?

(<https://twitter.com/KenGarffAuto>)

111 East Broadway
Salt Lake City, Utah 84111

Between Colleen
Coleman
& AASHAHLA AL-ALI

 Colleen Coleman

 Customer (0)

Back to Contacts

September 06, 2017

I think he is a used up and no telephone number. Michael Evans...lead for him came in on the 31st.
I am going to send it over to used cars; as he requested a 2013 town and country

Aashahla Al-Ali 12:25 PM

WHO DID YOU SEND IT TO?

Colleen Coleman 12:36 PM

used car bucket

Aashahla Al-Ali 1:48 PM

PLEASE DO NOT REASSIGN LEADS TO THE USED CAR BUCKET PLEASE JUST SEND
ME A SOCKET TALK MESSAGE.

Colleen Coleman 1:57 PM

That is the one I sent to you earlier today

Aashahla Al-Ali 4:44 PM

Ok no problem

Aashahla Al-Ali 4:44 PM

Send


IM


1000

Respond

Group IM Recipients

Close

 Colleen Coleman

 Customer (0)

Back to Contacts

September 07, 2017

Can I start receiving internet leads?

Aashahla Al-Ali 9:17 AM

Yesterday I learned in the training that I have to use a template to get credit for the emails I use. I also don't use mixie so all my calls are not being recorded. I am working but the report is not showing it.

Aashahla Al-Ali 9:36 AM

 Send

IM

1000

Respond

Group IM Recipients

Close

Daily Check Out Report Aashahla Al-Ali

Begin Date: 6/1/2017

End Date: 6/30/2017

☒ Show Graph ☐ Show Grid

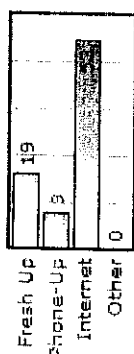
Reviewed By:

Assigned To: Aashahla Al-Ali

Southfield CJDR

Help

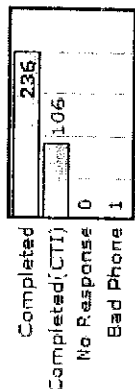
New Prospects



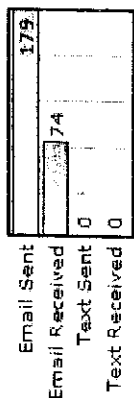
Appointments



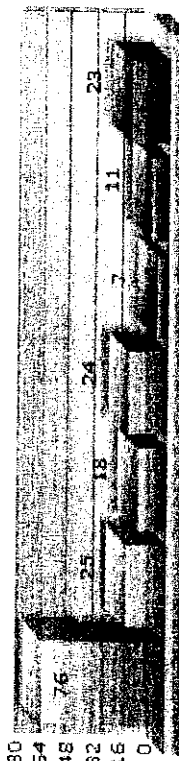
Phone Calls



Email/Text Communication



Completed Sales Steps



Sales Pipeline (Unsold Prospects)



Contacts Store Visit Demos Pending F&I Write-Up Last Deals Sold

0-Unqualified 1-Contacted 2-Store Visit 3-Demo 4-Write-Up 5-Pending F&I

Daily Check Out Report

Aashahla Al-Ali

Begin Date: 7/1/2017

End Date: 7/31/2017

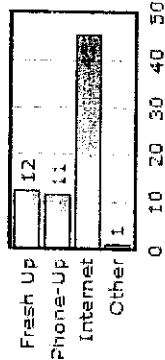
Reviewed By:

Assigned To: Aashahla Al-Ali

Help

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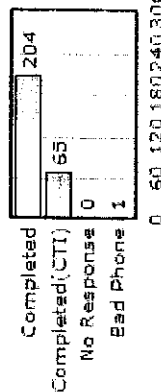
New Prospects



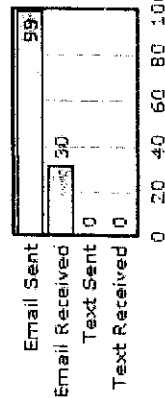
Appointments



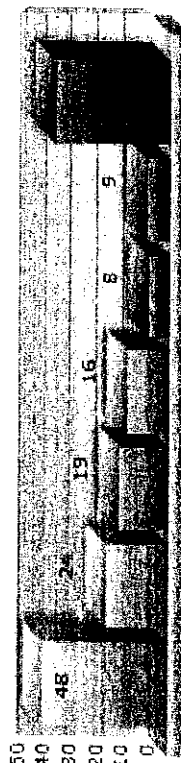
Phone Calls



Email/Text Communication



Completed Sales Steps



Sales Pipeline (Unsold Prospects)



Contacts Store Visit Demos Pending F&I Write-Up Lost Deals Sold

0-Unqualified 1-Contacted 2-Store Visit 3-Demo 4-Write-Up 5-Pending F&I

Daily Check Out Report Aashahla Al-Ali

Begin Date: 8/1/2017

End Date: 8/31/2017

Help

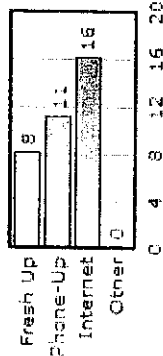
Southfield CJDR

Reviewed By:

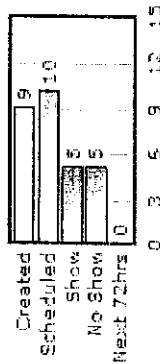
Assigned To: Aashahla Al-Ali

Show Graph Show Grid

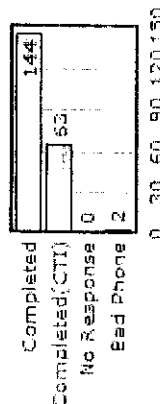
New Prospects



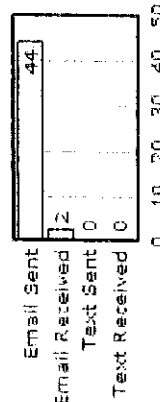
Appointments



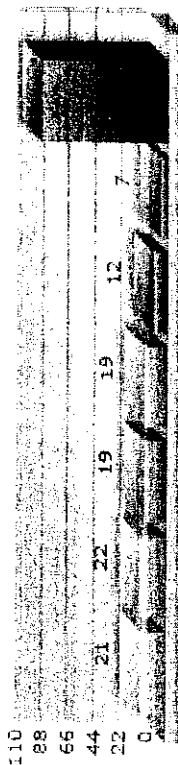
Phone Calls



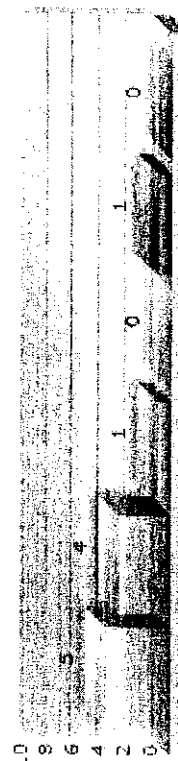
Email/Text Communication



Completed Sales Steps



Sales Pipeline(Unsold Prospects)



Contacts Demos Store Visit Pending F&I Write-Up Lost Deals Sold

0-Unqualified 1-Contacted 2-Store Visit 3-Demo 4-Write-Up 5-Pending F&I

Received 6/3
 then mail.kengartf.com
 Sent 7/1 email
 then mail.kengartf.com

Daily Check Out Report Andy Tavaraz

Begin Date: 8/1/2017
End Date: 8/26/2017

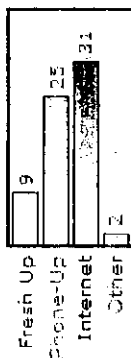
Show Graph Show Grid

Reviewed By: _____
Assigned To: Andy Tavaraz

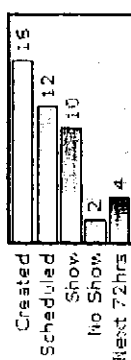
Help

Southfield CJDR

New Prospects



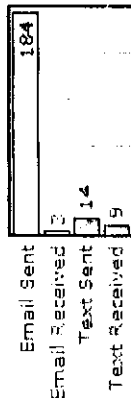
Appointments



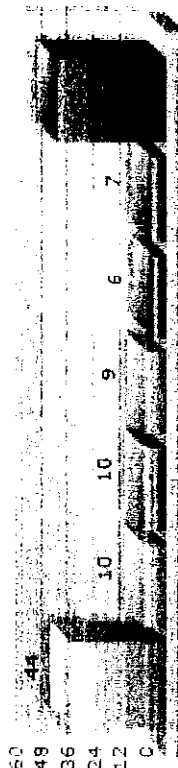
Phone Calls



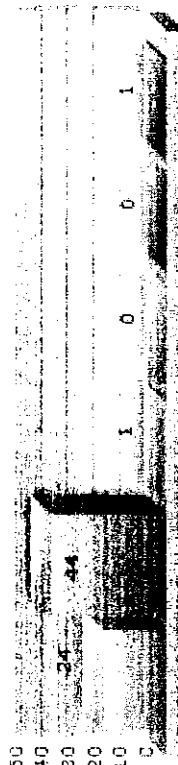
Email/Text Communication



Completed Sales Steps



Sales Pipeline(Unsold Prospects)



Contacts Store Visit Demos Pending F&U Write-Up Lost Deals Sold

0-Unqualified 1-Contacted 2-Store Visit 3-Demo 4-Write-Up 5-Pending F&U

Daily Check Out Report

Austin Moore

Begin Date: 8/1/2017

End Date: 8/26/2017

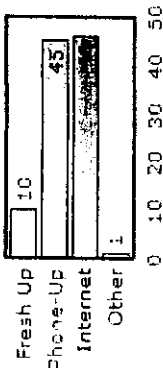
Southfield CJDR

Reviewed By:

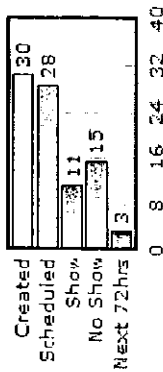
Assigned To: Austin Moore

☒ Show Graph ☐ Show Grid

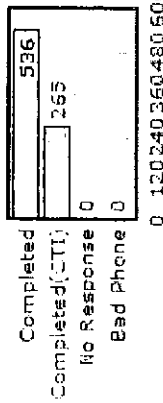
New Prospects



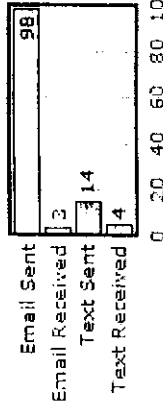
Appointments



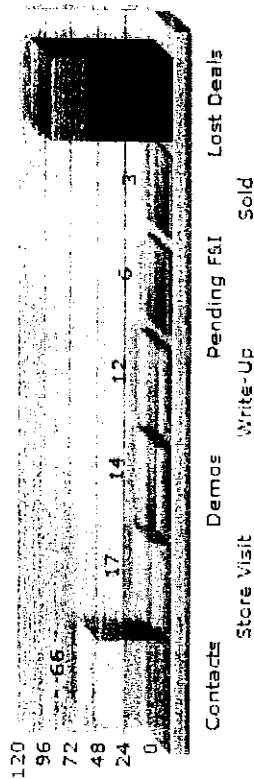
Phone Calls



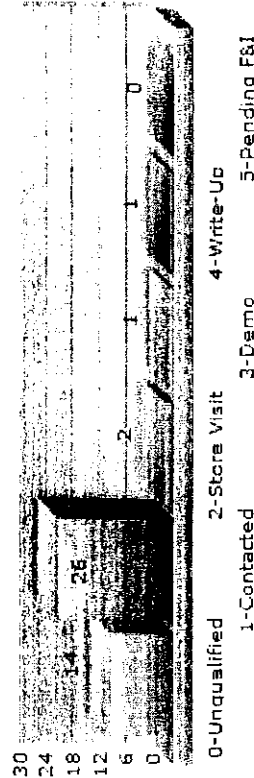
Email/Text Communication



Completed Sales Steps



Sales Pipeline(Unsold Prospects)



CIVIL COVER

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement provided by local rules of court. This form, approved by the Judicial Conference of the United purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM)

I. (a) PLAINTIFFS

AAshahla Al-Ali

(b) County of Residence of First Listed Plaintiff **Macomb**
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Judge: Borman, Paul D.

MJ: Majzoub, Mona K.

Filed: 08-28-2018 At 12:25 PM

CMP Al-Ali v. Ken Garff Automotive Group et ano. (EK)

Ken Garff Automotive Group/Southfield Chrysler

County of Residence of First Listed Defendant **Oakland**
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)
Starr, Butler, Alexopoulos and Stoner
20700 Civic Center Drive Ste 290
Southfield Michigan 48076

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT		TORTS		FORFEITURE/PENALTY		BANKRUPTCY		OTHER STATUTES	
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))	<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability			<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 450 Commerce	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 850 Securities/Commodities/ Exchange
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 370 Other Fraud			<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 890 Other Statutory Actions
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 371 Truth in Lending			<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations		<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage			<input type="checkbox"/> 490 Cable/Sat TV		<input type="checkbox"/> 490 Cable/Sat TV		<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 385 Property Damage Product Liability			<input type="checkbox"/> 850 Securities/Commodities/ Exchange		<input type="checkbox"/> 895 Freedom of Information Act		<input type="checkbox"/> 896 Arbitration
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability				<input type="checkbox"/> 890 Other Statutory Actions		<input type="checkbox"/> 891 Agricultural Acts		<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury				<input type="checkbox"/> 893 Environmental Matters		<input type="checkbox"/> 895 Freedom of Information Act		<input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice				<input type="checkbox"/> 896 Arbitration		<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision		
<input type="checkbox"/> 195 Contract Product Liability					<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision				
<input type="checkbox"/> 196 Franchise					<input type="checkbox"/> 950 Constitutionality of State Statutes				

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Title VII

Brief description of cause:

Discrimination and Retaliation

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

☐ Yes

☒ No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

☐ Yes

☒ No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

Notes :
